

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE FOLLOWING DOMAIN NAMES:

ROJADIRECTA.ORG, and
ROJADIRECTA.COM,

Defendants *in rem*.

Civil Action No. 1:11-cv-04139-PAC

**CLAIMANT'S NOTICE OF
MOTION TO DISMISS**

PLEASE TAKE NOTICE that upon the accompanying (a) Request for Judicial Notice dated August 5, 2011 and the exhibits thereto and (b) memorandum of law, Defendant Puerto 80 Projects, S.L.U. (“Puerto 80”) by its attorneys Spears & Imes LLP and Durie Tangri LLP, will move this Court at such time as the Court may direct at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Room 20C, New York, New York, for an order granting Puerto 80’s motion to dismiss.

Dated: August 5, 2011

Respectfully submitted,

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